

1 Michael F. Ram (SBN 104805)  
mram@forthepeople.com  
2 Marie N. Appel (SBN 187483)  
mappel@forthepeople.com  
3 MORGAN & MORGAN  
COMPLEX LITIGATION GROUP  
4 711 Van Ness Avenue, Suite 500  
San Francisco, CA 94102  
5 Telephone: (415) 358-6913  
Facsimile: (415) 358-6293

6 *Counsel for Plaintiffs*  
7 *and the Proposed Classes*

Megan O'Neill (SBN 220147)  
moneill@dtolaw.com  
DTO LAW  
2400 Broadway, Suite 200  
Redwood City, CA 94063  
Telephone: (415) 630-4100  
Facsimile: (415) 630-4105

Justin T. Goodwin (SBN 278721)  
jgoodwin@dtolaw.com  
David Ramirez-Galvez (SBN 313544)  
dramirezgalvez@dtolaw.com  
Nicole G. Malick (SBN 335754)  
nmalick@dtolaw.com  
DTO LAW  
601 South Figueroa Street, Suite 2130  
Los Angeles, CA 90017  
Telephone: (213) 335-6999  
Facsimile: (213) 335-7802

*Attorneys for Defendant HP INC.*

13 UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION

16  
17 HENRY SO and DANIEL DYKE,  
individually and on behalf of all other  
18 similarly situated individuals,  
19 Plaintiff,  
20 v.  
21 HP, INC. d/b/a HP COMPUTING AND  
PRINTING INC., a Delaware Corporation  
22  
23 Defendant.

Case No. 5:22-cv-02327-PCP

STIPULATION AND ~~PROPOSED~~  
ORDER SETTING CASE  
MANAGEMENT SCHEDULE

Honorable P. Casey Pitts

Pursuant to the Court's October 12, 2023 Order (ECF 62), Plaintiffs Henry So and Daniel Dyke, and Defendant HP Inc. jointly submit the following proposed Case Management Schedule.

Event	Proposed Date
Deadline to Amend Pleadings	10/27/2023
Deadline to file class certification motion and for Plaintiffs to serve any expert disclosures and reports pursuant to Rule 26(a)(2) relating to class certification.	8/30/2024
Deadline to file opposition to class certification motion and for Defendant to serve any rebuttal expert disclosures and reports pursuant to Rule 26(a)(2) relating to class certification; and move to limit or exclude Plaintiff's class certification expert testimony.	10/25/2024
Deadline to file reply re class certification and move to limit or exclude HP's class certification expert testimony	11/27/2024
Last day to conduct mediation	12/15/2024
Deadline to designate opening expert testimony and full Opening Expert Reports under 26(a)(2)	1/17/2025
Opposition Expert Reports Due	2/28/2025
Rebuttal expert disclosures due	3/21/2025
Expert discovery cut-off	4/4/2025
Close of fact discovery	4/4/2025
Last day for hearing dispositive motions	To be set following notice period to class, if applicable.

Event	Proposed Date
Trial date	To be set following notice period to class, if applicable.

Respectfully submitted,

Dated: October 18, 2023

By: /s/ Marie N. Appel

MORGAN & MORGAN  
COMPLEX LITIGATION GROUP  
Michael F. Ram (SBN 104805)  
mram@forthepeople.com  
Marie N. Appel (SBN 187483)  
mappel@forthepeople.com  
711 Van Ness Avenue, Suite 500  
San Francisco, CA 94102  
Telephone: (415) 358-6913  
Facsimile: (415) 358-6293

*Counsel for Plaintiffs  
and the Proposed Classes*

Dated: October 18, 2023

By: /s/ Megan O'Neill

Megan O'Neill (SBN 220147)  
moneill@dtolaw.com  
DTO LAW  
2400 Broadway, Suite 200  
Redwood City, CA 94063  
Telephone: (415) 630-4100  
Facsimile: (415) 630-4105

Justin T. Goodwin (SBN 278721)  
jgoodwin@dtolaw.com  
David Ramirez-Galvez (SBN 313544)  
dramirezgalvez@dtolaw.com  
Nicole G. Malick (SBN 335754)  
nmalick@dtolaw.com  
DTO LAW  
601 South Figueroa Street, Suite 2130  
Los Angeles, CA 90017  
Telephone: (213) 335-6999  
Facsimile: (213) 335-7802

*Attorneys for Defendant HP INC.*

**ECF ATTESTATION**

I, Marie N. Appel, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(I)(3), I attest that Megan O'Neill has concurred to this filing.

Dated: October 18, 2023

By: /s/ Marie N. Appel

Pursuant to stipulation, IT IS SO ORDERED.

Dated: October 19, 2023



Hon. P. Casey Pitts  
United States District Judge